

# Exhibit 2b

1 N. Severin

2 A. Always. Constantly.

3 Q. How long might it take to help groom  
4 a client?

5 A. About an hour.

6 Q. Would the time it took to groom a  
7 client differ if you had to partially assist  
8 them versus totally assist them?

9 A. Not always.

10 Q. Would it differ at times though?

11 A. Yes, it was different time.

12 Q. Did you ever take Ms. [REDACTED] for a  
13 walk outside?

14 A. I don't remember about taking her out  
15 to the street, but we walked a lot in her  
16 hallway and also we did exercises.

17 Q. What type of exercises would you do?

18 A. Well, walking was a very important  
19 exercise for her.

20 Q. And how long would you typically try  
21 to walk with her during your shift?

22 A. Well, we walked a lot.

23 Q. And how long would you say that  
24 typically lasted for?

25 A. Whatever she was able to withstand.

1 N. Severin

2 Q. What was the longest she was able to  
3 walk?

4 A. Well, I don't know. I would say she  
5 walked for one-third of my shift.

6 [In English] Yes.

7 Q. Did you ever take her outside of the  
8 apartment?

9 Outside of the apartment meaning  
10 outside the apartment building.

11 A. I don't remember.

12 Q. Did you ever take any of your other  
13 clients outside of their homes?

14 A. Very many of them.

15 Q. And where might you take a client  
16 outside of their home?

17 A. Go for a walk to get some fresh air,  
18 to sit on a bench near the apartment building,  
19 to visit the doctor, physiotherapy. To visit  
20 their relatives.

21 Q. And when you did these activities  
22 with the client -- let's withdraw that.

23 You mentioned one of your clients you  
24 would take them to sit on a park bench, correct?

25 Would you stay with them while they

1 N. Severin

2 sat on a park bench?

3 A. Of course. You cannot leave them  
4 alone.

5 Q. And how long might a client sit on a  
6 park bench for?

7 A. Up to three hours.

8 Q. You mentioned also you might take a  
9 client to a doctor's appointment.

10 Would you wait at the doctor's while  
11 that person had their appointment?

12 A. By all means.

13 Q. And how long might a doctor's  
14 appointment last?

15 A. Well, Russian doctors have huge  
16 lines. Sometimes it would take up to four  
17 hours.

18 Q. Did you ever take a client to a  
19 physical therapy session?

20 A. I don't remember.

21 Q. You mentioned you would take a client  
22 to their relatives; is that correct?

23 A. Yes.

24 Q. Would you go to the relative's home?

25 A. Yes.

1 N. Severin

2 Q. Would you stay with the client when  
3 they were with the relatives?

4 A. Yes, and I still was doing care for  
5 them, was doing care procedures for them.

6 Q. And how often would you say you might  
7 take a client to a relative's home?

8 A. So, for example, [REDACTED], for all  
9 Jewish holidays.

10 Q. Let's talk about [REDACTED] on a Jewish  
11 holiday.

12 How long would she remain in the  
13 relative's home during that Jewish holiday?

14 A. For quite a lot of time. The entire  
15 Pesach procedures.

16 Q. Pesach means Passover?

17 A. Yes, Passover.

18 Q. Would you ever take a client to meet  
19 someone at a restaurant?

20 A. No. My clients were poor.

21 Q. Did the length of time you spent  
22 outside with a client depend on that client?

23 A. Yes, wishes and state of health.

24 MR. ARNOLD: What time do you want to  
25 break for lunch? What would work for you?

1 N. Severin

2 often.

3 Q. And how often would you say that you  
4 did Ms. [REDACTED] laundry?

5 A. Sometimes every shift. It was when  
6 she ate, she soiled her clothing.

7 Q. And how long might it take to do  
8 Ms. [REDACTED] laundry?

9 A. It could have taken half an hour or  
10 an hour.

11 Q. Did Ms. [REDACTED] have a laundry  
12 machine in her apartment?

13 A. I don't remember.

14 Q. Do you remember if any of your  
15 clients had laundry machines inside of their  
16 apartment?

17 A. I don't remember.

18 Q. Do you remember if you had to do  
19 laundry for a client in a laundry room inside  
20 the apartment building?

21 A. Most often.

22 Q. Did any of your clients live in --  
23 some of your clients lived in apartments.

24 Did any of your clients live in a  
25 home?

1 N. Severin

2 A. I don't remember now.

3 Q. Did you ever have to iron

4 Ms. [REDACTED] clothes?

5 A. I don't remember.

6 Q. Do you remember if you ever had to  
7 iron any of your other clients' clothes?

8 A. Sometimes.

9 Q. Do you remember how long it would  
10 take to iron a client's clothes?

11 A. Mostly clients ask to iron bedding  
12 rather than clothes, and to iron bedding it  
13 takes a long time.

14 Q. Do any of your clients only ask you  
15 to iron their clothes and not their bedding?

16 A. No.

17 Q. Would it take a longer amount of time  
18 to iron bedding as opposed to clothes?

19 A. Of course.

20 Q. How often does Ms. [REDACTED] Plan of  
21 Care say that her bed should be made?

22 A. [In English] Made bed daily.

23 [Through the Interpreter] Every day  
24 make bed.

25 Q. And did you make Ms. [REDACTED] bed



1 N. Severin

2 every single day?

3 A. Well, not only I did it every day,  
4 but very often I had to do it at night as well.

5 Q. Did you ever have to make her bed  
6 more than once in a day?

7 A. Many times.

8 Q. How long might it take to make  
9 Ms. [REDACTED] bed?

10 A. It depends on the state of the bed,  
11 the structure.

12 Q. Did the state of a bed differ for  
13 your clients?

14 A. Of course.

15 Q. And how might they differ?

16 A. It depended on the psychiatric state,  
17 psychiatric health.

18 Q. Why would a client's psychiatric  
19 health affect the state of their bed?

20 A. Some clients were anxious and they  
21 can throw their blanket on the floor or take off  
22 their bed sheets from the bed and throw it on  
23 the floor. Say, for example, [REDACTED] very often  
24 spit behind the bed, spat, and on the bed.

25 Q. And you would clean up after that



1 N. Severin

2 happened?

3 A. Well, I had to pull out the bed and  
4 clean behind the bed.

5 [In English] Move furniture.

6 (Through the Interpreter] Move  
7 furniture.

8 Q. Did you ever work a daytime hourly  
9 shift for a client?

10 A. Always.

11 Q. And did you ever work a daytime  
12 hourly shift for a client who did not go into  
13 their bedroom?

14 A. No.

15 MS. SMITH: Sorry. I actually need  
16 to take a quick break.

17 MR. ARNOLD: Yes, of course. No  
18 problem.

19 (Lunch recess is taken from 12:15  
20 p.m. until 12:57 p.m.)  
21  
22  
23  
24  
25

1 N. Severin

2 Q. And how often does the [REDACTED] Plan  
3 of Care indicate that the kitchen should be  
4 cleaned?

5 A. Weekly.

6 Q. Does the [REDACTED] Plan of Care  
7 indicate that the home attendant should clean  
8 Ms. [REDACTED] room?

9 A. I don't see it here.

10 Q. How often does the [REDACTED] Plan of  
11 Care indicate that the refrigerator should be  
12 cleaned?

13 A. Monthly.

14 Q. Did you ever clean Ms. [REDACTED]  
15 refrigerator?

16 A. I don't remember.

17 Q. Did you ever go to the market for  
18 Ms. [REDACTED]?

19 A. No.

20 Q. Did you ever go to the market for any  
21 other client?

22 A. Often.

23 Q. And would you ever buy groceries at  
24 the market for a client?

25 A. Of course.

1 N. Severin

2 Q. How long did it typically take to buy  
3 groceries for a client?

4 A. Sometimes clients want you  
5 specifically to go to Brighton Beach where they  
6 have a lot of Russian stores and a lot of  
7 Russian food, and then it could take a long  
8 time, up to two hours.

9 Q. And for the clients that didn't want  
10 you to go to Brighton Beach, how long would it  
11 take to grocery shop?

12 A. It depends on how far are the  
13 supermarkets and how big are the lines there.

14 Q. Did the client's grocery shopping  
15 list vary from client to client?

16 A. Yes.

17 Q. Were there any clients like  
18 Ms. [REDACTED] who you never went to the market  
19 for?

20 A. Yes. It's kind of clients whom you  
21 cannot leave alone.

22 Q. Did you ever go to a pharmacy to pick  
23 up medicine for a client?

24 A. Yes.

25 Q. And how long might that take?

1 N. Severin

2 A. Sometimes I would have to go to the  
3 pharmacy which was far from home.

4 Q. And how far might that be?

5 A. It really depended on transportation.

6 Q. So if you had to walk, how long might  
7 it take to pick up a prescription for a client?

8 A. From half an hour to an hour.

9 Q. Did Project OHR permit you to engage  
10 in heavy duty cleaning activities?

11 MS. SMITH: Objection.

12 A. Yes.

13 Q. Did anyone at Project OHR tell you  
14 that you were permitted to engage in heavy duty  
15 cleaning activities?

16 A. Well, when I would say to them that I  
17 do not want to do heavy duty cleaning, they  
18 would answer, "If you want to continue working  
19 for us, then you do it."

20 Q. Who told you that?

21 A. [In English] Miriam.

22 THE INTERPRETER: Who?

23 THE WITNESS: [Miriam].

24 A. Miriam.

25 Q. Did anybody else tell you that?

1 N. Severin

2 A. [In English] I don't remember now.

3 MR. ARNOLD: I'm going to mark this  
4 as Defendants' Exhibit No. 10.

5 (Defendants' Exhibit 10, Project OHR  
6 Client Handbook, Bates stamped P1 through  
7 P24, marked for identification, as of this  
8 date.)

9 BY MR. ARNOLD:

10 Q. I'm showing you what's been marked as  
11 Defendants' Exhibit 10. It's Bates stamped P1  
12 to P24.

13 Ms. Severin, do you recognize this  
14 document?

15 A. I saw my client's having it.

16 Q. Did you give this document to your  
17 attorneys?

18 A. Yes.

19 Q. Is that your handwriting in the upper  
20 right-hand corner?

21 A. Yes.

22 Q. What did you write in the upper  
23 right-hand corner?

24 A. This was an article in The New York  
25 Times on December 30, 2008 with a title "Home

1 N. Severin

2 Health Aides: What They Make, What They Cost."

3 Q. Is this an article that you read?

4 A. Yes.

5 Q. And when did you read that article?

6 A. I don't remember.

7 Q. Was it at some point before this  
8 lawsuit started?

9 A. Yes.

10 Q. Did somebody give you that article to  
11 read?

12 A. I found it in the Internet.

13 Q. You said that you gave this document  
14 to your attorneys.

15 Did you review the contents of this  
16 document?

17 A. Very long ago.

18 Q. You mentioned that this document was  
19 also in your clients' homes; is that correct?

20 A. Yes.

21 Q. Did you ever read this document while  
22 at a client's home?

23 A. I looked through it.

24 Q. And what is the name of this  
25 document?

1 N. Severin

2 A. I don't know how to translate it.

3 Well, client handbook.

4 THE INTERPRETER: Something like  
5 that, she's asking handbook.

6 BY MR. ARNOLD:

7 Q. If you can turn to P17.

8 (Witness complies.)

9 Q. And about almost halfway down there's  
10 a section that says, "Home attendants are  
11 neither required nor permitted to perform heavy  
12 duty cleaning tasks such as (A) washing windows  
13 or blinds, (B) moving furniture, (C) waxing  
14 floors."

15 Do you see that section?

16 THE INTERPRETER: Excuse me. It's  
17 page 17?

18 MR. ARNOLD: P17.

19 THE INTERPRETER: Okay.

20 MR. ARNOLD: Page 14 of the handbook.

21 THE INTERPRETER: Okay.

22 (Document review.)

23 A. Yes.

24 Q. My question is --

25 A. [In English] I didn't understand



1 N. Severin

2 practice.

3 Q. Wasn't it the nurse's responsibility  
4 to complete a Plan of Care?

5 A. Yes, usually the nurse does it.

6 Q. And it was your job to follow the  
7 Plan of Care; is that right?

8 A. Yes.

9 Q. Did you ever have any client who  
10 slept through an entire night?

11 A. No.

12 Q. So you mentioned that you provided  
13 care for over, possibly over 100 clients during  
14 your six years of employment.

15 It's your testimony today that not  
16 one single client on one single night slept  
17 through the entire night?

18 A. Of course, because otherwise why  
19 would we be employed there if they sleep this  
20 long for the night?

21 Q. So just to get an actual answer to my  
22 question, is it your testimony that during your  
23 time of employment where you provided care for  
24 over 100 clients, not one of them ever slept  
25 through the night?

1 N. Severin

2 Q. And was there ever a time when the  
3 job was cancelled where you didn't perform any  
4 work that day for Project OHR?

5 A. No. No.

6 Q. No, you didn't perform work?

7 A. I don't understand the question then.

8 Q. Fair enough.

9 Was there ever a time when your shift  
10 was cancelled and you went home and did not  
11 perform any work that day for Project OHR?

12 A. I don't remember.

13 Q. Why might a shift be cancelled?

14 A. Patient could have been in the  
15 hospital.

16 Q. You mentioned a [REDACTED] earlier.  
17 Do you remember when you started  
18 caring for [REDACTED]?

19 A. In January 2006.

20 Q. What shifts did you typically work  
21 for Ms. [REDACTED]?

22 A. This was a live-in case on Saturdays  
23 and Sundays, and sometimes I would work as a  
24 replacement for my colleagues.

25 Q. Is the "live-in shift" the same thing

1 N. Severin

2 as a "sleep-in shift"?

3 A. This is a question for a linguist.  
4 We call them both.

5 Q. How long did you care for Ms. [REDACTED]?

6 A. To September 2008.

7 Q. So was that about two-and-a-half  
8 years?

9 A. Thirty-three months.

10 Q. Would you consider that a long time?

11 A. I think, yes.

12 Q. Did Ms. [REDACTED] live in an apartment?

13 A. Yes.

14 Q. Can you describe Ms. [REDACTED]  
15 apartment?

16 A. Two rooms, rather big, and a kitchen  
17 and a small hallway.

18 Q. Okay. Was one -- the two rooms, can  
19 you describe those rooms?

20 A. There was a fair amount of furniture  
21 in these two rooms, old-fashioned furniture and  
22 heavy.

23 MR. ARNOLD: And what?

24 THE INTERPRETER: And heavy.

25 MR. ARNOLD: Oh, got it.

1 N. Severin

2 THE INTERPRETER: Heavy  
3 old-fashioned.

4 A. There were beds and bed stands, and a  
5 table in the living room. There were no doors.

6 Q. Was the living room one of the two  
7 rooms?

8 A. There were two different rooms, but  
9 they didn't have doors in them. Each of these  
10 rooms did not have a door.

11 Q. Were these two rooms next to each  
12 other?

13 A. No, the kitchen was between them.

14 MR. ARNOLD: Okay. Let's mark this  
15 as Defendants' Exhibit No. 13. They're  
16 documents Bates stamped 02370 -- I take  
17 that back, sorry. D02364 to D02370.

18 MS. SMITH: I have a different number  
19 here.

20 MR. ARNOLD: Give me two minutes.  
21 I'll be right back.

22 (Recess is taken.)

23 MR. ARNOLD: I apologize about that.  
24 Let's go back.

25 This is No. 13, Defendants' Exhibit

1 N. Severin

2 Q. Did Ms. [REDACTED] have difficulty moving?

3 A. She was blind. She did not have  
4 difficulty moving.

5 However, without a walking stick,  
6 this was really dangerous because at any given  
7 moment she could have hit herself on the wall or  
8 slip and fall, stumble and fall.

9 Q. Did she take any medicine?

10 A. Yes.

11 Q. Did she ever take a nap?

12 A. For a very short time.

13 Q. Did any of your other clients take  
14 naps?

15 A. For a short time.

16 Q. Did the length of your other clients'  
17 nap differ depending on the client?

18 A. It was different, but it was always  
19 usually very short.

20 Q. And what about when your clients went  
21 to sleep at night? Did the period of time they  
22 slept differ from client to client?

23 A. Mostly my clients did not sleep.

24 Q. Okay. Did your clients stay up 24  
25 hours a day?

1 N. Severin

2 A. Sometimes it would be necessary to  
3 change their Pampers and also to turn them.

4 Q. Were any of your clients -- did any  
5 of your clients take medication that made them  
6 drowsy?

7 A. I don't know why they were drowsy.

8 Q. Where would Ms. [REDACTED] eat in her  
9 apartment?

10 A. She eat in the kitchen. She eat in  
11 my room. Sometimes she eat in my room. You  
12 know, she was 99 years old and then when I was  
13 leaving her, she was 101.

14 Q. Pretty amazing.

15 A. She was blessed by God.

16 Q. That's pretty amazing.

17 So I take it she couldn't bathe  
18 herself?

19 A. She needed help.

20 Q. How long would it typically take for  
21 you to bathe Ms. [REDACTED]?

22 A. Ms. [REDACTED] loved to bathe. Well, you  
23 know, she was kind of swimming in her bathtub,  
24 enjoying herself, and she could easily spend an  
25 hour or more.



1 N. Severin

2 Q. Would she get water on the bathroom  
3 floor when she would take a bath?

4 A. If any water sometimes spilled on the  
5 floor, I would make 300 percent attempt to make  
6 sure that it's not on the floor.

7 Q. Did you assist Ms. [REDACTED] with going  
8 to the bathroom?

9 A. Yes, otherwise she wouldn't be able  
10 to do it.

11 Q. And how long would it typically take  
12 for you to help her go to the bathroom?

13 A. At nights it would be for a very long  
14 time.

15 Q. What about during the day?

16 A. Shorter.

17 Q. And why would it differ depending day  
18 or night?

19 A. At night she would behave  
20 differently.

21 Q. You said that she didn't know the  
22 difference between day and night.

23 A. But this particular process you're  
24 asking about was different. See, for example,  
25 at nights she tried to administer herself



1 N. Severin

2 A. Well, not so long.

3 Q. How long is not so long?

4 A. Five, ten minutes.

5 Q. Would it take longer to dress her to  
6 go outside than it would to dress her for bed?

7 A. It took more time to put clothes on  
8 her than to take off her clothes.

9 Q. Where would Ms. [REDACTED] spend most of  
10 her time?

11 A. Mostly she was just walking in the  
12 apartment, strolling.

13 Q. And you would supervise her strolling  
14 in the apartment?

15 A. No. I worked like a see dog. I was  
16 walking near her.

17 THE INTERPRETER: Seeing dog.

18 MR. ARNOLD: Thank you.

19 THE INTERPRETER: What do you mean --

20 MR. ARNOLD: Oh, seeing eye dog.

21 THE INTERPRETER: Seeing eye dog,  
22 yeah.

23 A. Yes, I worked as a seeing eye dog  
24 because she was -- she could have fell down.

25 Q. How often does Ms. [REDACTED] Plans of

1 N. Severin

2 Care indicate that her laundry should be done?

3 THE INTERPRETER: Her laundry?

4 MR. ARNOLD: Yes.

5 (Interpreting.)

6 A. Weekly.

7 Q. How often -- and would you do

8 Ms. [REDACTED] laundry?

9 A. Yes, but happened like three times a  
10 day.

11 Q. How long would it take you to do

12 Ms. [REDACTED] laundry?

13 A. From two hours to twenty minutes.

14 MR. ARNOLD: Two hours and 20 minutes  
15 or two hours --

16 THE INTERPRETER: From 20 minutes to  
17 two hours.

18 MR. ARNOLD: Thank you.

19 BY MR. ARNOLD:

20 Q. And would you do her laundry -- why  
21 would you do her laundry more than once a day?

22 A. Blind people very often soil their  
23 bedding and clothing.

24 Q. Did you ever have a client that went  
25 through an entire day where they did not soil

1 N. Severin

2 themselves?

3 A. Yes.

4 Q. How often does the [REDACTED] Plan of Care  
5 indicate that you should make her bed?

6 A. Daily.

7 Q. And how often did you make  
8 Ms. [REDACTED] bed?

9 A. Sometimes up to three times.

10 Q. And why would you need to make her  
11 bed up to three times?

12 A. For the same reason; she was blind,  
13 so she could have taken her bed sheet off of the  
14 bed, she could have soiled it, she could have  
15 also get entangled in her bedding.

16 Q. How often do the [REDACTED] Plans of Care  
17 indicate that the household should be dusted,  
18 vacuumed or mopped?

19 A. They say once a month -- a week.

20 Q. How often does the Plan of Care say  
21 her bathroom should be cleaned?

22 THE INTERPRETER: She's asking where  
23 is it. Here.

24 (Document review.)

25 A. Weekly, but it's just laughable.

1 N. Severin

2 It's funny statement.

3 Q. And why is that a funny statement?

4 A. Because she was a blind person, so I  
5 had to clean her bathroom several times. What's  
6 more, she could urinate on the floor,  
7 particularly during the nighttime.

8 [In English] Many times.

9 Q. So you had to make sure it was clean  
10 so she wouldn't urinate.

11 A. Yes, I had to make sure that  
12 everything was clean and dry.

13 Q. How often does the [REDACTED] Plan of Care  
14 indicate that Ms. [REDACTED] kitchen should be  
15 cleaned?

16 A. Once a week.

17 Q. And how often does the [REDACTED] Plans of  
18 Care indicate that the refrigerator should be  
19 cleaned?

20 A. Every month.

21 Q. Did you ever clean Ms. [REDACTED]  
22 refrigerator?

23 A. Yes.

24 Q. After you cleaned Ms. [REDACTED]  
25 refrigerator, when would be the next time that

1 N. Severin

2 you would clean Ms. [REDACTED] refrigerator?

3 A. Well, officially in a month.

4 However, in reality I could have done  
5 it in a week.

6 Q. Okay. What would you do to clean the  
7 refrigerator?

8 A. I took all the food stuff out of the  
9 refrigerator and washed it, and then I would pat  
10 it dry and then I put or would put all the food  
11 stuff back.

12 Q. And how much food stuff was to  
13 cleaned in the refrigerator?

14 A. There was not much food there.

15 Q. How long would it typically take you  
16 to finish cleaning the refrigerator?

17 A. An hour, hour-and-a-half.

18 Q. What type of a refrigerator did --  
19 withdrawn.

20 How big was [REDACTED] refrigerator?

21 A. Like me, tall as I am.

22 Q. So a standard size?

23 A. [In English] Standard.

24 [Through the Interpreter] Standard.

25 Q. Did you ever pick up medicine for

1 N. Severin

2 Ms. [REDACTED]?

3 A. I was never able to leave the house  
4 when she was there, since she was in the house.

5 Q. At some point in time you stopped  
6 caring for Ms. [REDACTED]; is that correct?

7 A. When I was allowed to leave this  
8 case.

9 Q. Okay. And --

10 A. To quit working for this case.

11 Q. After that case was finished, do you  
12 remember if you worked any more sleep-in shifts  
13 for Project OHR?

14 A. Several replacements.

15 Q. Okay. After you were done with  
16 Ms. Lazar's case, did you usually work hourly  
17 shifts for the rest of your employment?

18 A. Yes.

19 Q. And did you work hourly shifts on the  
20 weekdays sometimes?

21 A. Yes, but most often my shifts were on  
22 Saturdays and Sundays.

23 Q. Was there ever a week when you worked  
24 at Project OHR when you worked less than 40  
25 hours?



1 N. Severin

2 the Defendants' Exhibit No. 10?

3 (Document review.)

4 Q. If you can please turn to the page  
5 that's marked P17?

6 (Witness complies.)

7 Q. Earlier we looked at the fifth  
8 paragraph down that reads, among other things,  
9 "Home attendants are neither required nor  
10 permitted to perform heavy duty cleaning  
11 tasks..." and then several are listed.

12 Do you remember that?

13 A. Yes.

14 Q. Ms. Severin, when you were employed  
15 by Project OHR, did you ever wash windows or  
16 blinds for an OHR client?

17 A. Very often.

18 Q. And when you were employed by Project  
19 OHR, did you ever move furniture at OHR clients'  
20 houses?

21 A. Yes.

22 Q. Can you say how often?

23 A. For a client like [REDACTED], almost  
24 daily.

25 Q. Did you ever wax floors when you were



1 N. Severin

2 employed by Project OHR for OHR's clients?

3 A. They didn't have floors that required  
4 waxing.

5 Q. And when you were employed by Project  
6 OHR, did you ever do laundry by hand for any of  
7 OHR's clients?

8 A. Very often, several times a day.

9 Q. Ms. Severin, can you look at a  
10 document marked as Defendants' Exhibit No. 7?

11 (Document review.)

12 A. Yes.

13 Q. Do you recall writing this letter?

14 A. Yes.

15 Q. What were the circumstances that led  
16 to you deciding to write this letter?

17 A. At the time I worked on [REDACTED]  
18 case, I completely forgot what is it to sleep  
19 through the night. Well, I was very tired and I  
20 was frightened to learn that such jobs exist at  
21 all.

22 Q. Was there anything else that you  
23 remember about the circumstances that caused you  
24 to write that letter?

25 A. No.

1 N. Severin

2 would anybody else come in during those four  
3 days to do any kind of household chores?

4 A. Nobody.

5 Q. And when you were working at  
6 Ms. [REDACTED] house, did you dust -- how often  
7 did you dust, vacuum or mop?

8 MR. ARNOLD: Object.

9 A. Well, every day and probably I mopped  
10 several times a day because I like to work in  
11 clean environment.

12 Q. And when you were working for  
13 Ms. [REDACTED], how often did you clean her  
14 bathroom?

15 A. Every day.

16 Q. When you were working for  
17 Ms. [REDACTED], how often did you clean her  
18 kitchen?

19 A. Once or twice a day.

20 Q. And when you were working for  
21 Ms. [REDACTED], how often did you clean her  
22 refrigerator?

23 A. [In English] Weekly.

24 [Through the Interpreter] Weekly.

25 Q. Could you please turn to Defendants'

1 N. Severin

2 any household chores or cleaning?

3 MR. ARNOLD: Object.

4 A. No.

5 Q. And when you were working for  
6 Ms. [REDACTED], how often did you dust, vacuum or mop  
7 in her house?

8 MR. ARNOLD: Object.

9 A. Several times a day. Several.

10 Q. When you were working for Ms. [REDACTED],  
11 how often did you clean her bathroom?

12 A. Sometimes it would be five times a  
13 day and the same amount of times at night.

14 Q. When you were working with Ms. [REDACTED],  
15 how often did you clean the kitchen?

16 A. Two to three times daily.

17 Q. Now when you were working for  
18 Ms. [REDACTED], how often did you clean the  
19 refrigerator?

20 A. Every week.

21 Q. Okay. Thank you.

22 Looking at the list of household  
23 chores that's listed at the bottom of  
24 Exhibit 13, are there any household chores that  
25 are not on this list that you nonetheless had to

1 N. Severin

2 do for clients of Project OHR?

3 MR. ARNOLD: Objection.

4 A. I think, yes, but right now I'm not  
5 ready to list them.

6 Q. Can you not think of any other  
7 cleaning tasks that you did for OHR that aren't  
8 on this list?

9 A. I don't remember now.

10 MS. SMITH: No further questions.

11 MR. ARNOLD: Just a couple more.

12 FURTHER EXAMINATION BY

13 MR. ARNOLD:

14 Q. You mentioned there was a client that  
15 you didn't want to go in the kitchen because she  
16 thought she would turn off the gas.

17 Do you recall that testimony?

18 A. [REDACTED].

19 Q. And would you try to prevent her from  
20 going into the kitchen?

21 A. Yes, I tried to distract her  
22 attention and to switch her attention to  
23 something else.

24 Q. And did you prepare Mrs. [REDACTED]  
25 meals?

1 N. Severin

2 A. I don't remember.

3 Q. Okay. Did Ms. [REDACTED] ever use her  
4 refrigerator?

5 A. She has forgotten what it was.

6 Q. I'm sorry?

7 A. She had forgotten what it was, a  
8 refrigerator.

9 Q. You're saying Ms. [REDACTED] did not  
10 know what a refrigerator was?

11 A. She was demented completely. Has  
12 Alzheimer's.

13 Q. The question was did she ever use her  
14 refrigerator.

15 A. No.

16 Q. So during a shift for Ms. [REDACTED]  
17 were you the only one using the refrigerator?

18 A. Yes.

19 Q. Do you consider yourself a messy  
20 person?

21 MS. SMITH: Objection.

22 A. No. I actually put everything in  
23 order.

24 Q. Okay.

25 MR. ARNOLD: I'm good. No more

1  
2 questions. Thank you very much for coming  
3 in today. Nice to meet you.

4 (Time noted: 2:38 p.m.)  
5

6  
7 \_\_\_\_\_  
8 NATASHA VITTORIA SEVERIN  
9

10 Subscribed and sworn to before me  
11 this day of 20011.  
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## C E R T I F I C A T E

STATE OF NEW YORK )

) ss.:

COUNTY OF WESTCHESTER )

I, ANNETTE ARLEQUIN, a Notary Public  
within and for the State of New York, do  
hereby certify:

That NATASHA VITTORIA SEVERIN, the  
witness whose deposition is hereinbefore  
set forth, was duly sworn by me and that  
such deposition is a true record of the  
testimony given by such witness.

I further certify that I am not  
related to any of the parties to this  
action by blood or marriage; and that I am  
in no way interested in the outcome of this  
matter.

IN WITNESS WHEREOF, I have hereunto  
set my hand this 30th day of September, 2011.



ANNETTE ARLEQUIN, CCR, RPR



